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November 16, 2015

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Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

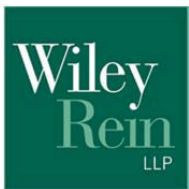
Re: Notice of Oral *Ex Parte* Presentation; Comprehensive Review of Licensing  
and Operating Rules for Satellite Services, IB Docket No. 12-267

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Federal Communications Commission's ("Commission") rules, 47 C.F.R. § 1.1206, this letter notifies the Commission that on November 12, 2015, Susan Crandall and Hazem Moakkit, of Intelsat, and Bert Rein of Wiley Rein LLP and counsel for Intelsat, met with Phil Verveer and Diane Cornell of Chairman Wheeler's office and Jose Albuquerque of the International Bureau to discuss the FCC's two-degree spacing policy under consideration in the above-referenced proceeding.

Intelsat reiterated that the two-degree spacing policy is outdated, no longer serves the interests of the United States and its consumers, and today confers a competitive advantage on foreign-licensed satellite operators with U.S. market access – an advantage that would not be reciprocated to U.S. licensees serving the home markets of those foreign operators. Intelsat explained that the two-degree rules have accomplished their intended purpose of maximizing the number of entrants serving the United States, and that – in light of developments in the industry – are now having serious unintended consequences and should be eliminated in favor of adopting the ITU rules and regulations going forward.

Intelsat argued that the two-degree rules should be eliminated because they result in the devaluation of U.S. ITU filings and in foreign filings receiving better treatment by the United States than U.S. filings would enjoy from foreign administrations. Essentially, Intelsat noted that the two-degree rules have loopholes that are being used by some operators in a manner that is inconsistent with the spirit of the rules. While the FCC has tried over time to address some of the loopholes through licensing conditions, a more definitive solution is warranted. Intelsat also asked whether the Commission had confirmed with the appropriate U.S. agencies that application of the two-degree rules in cases where the foreign ITU filing's priority would be devalued relative to a U.S. or other foreign ITU filing is consistent with the United States' treaty obligations. Intelsat described an existing situation in which a foreign operator with U.S. market access recently was told by another



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operator utilizing a lower priority foreign ITU filing that two-degree levels apply, irrespective of the higher priority of one of the foreign ITU filings.

Intelsat also discussed the Commission's proposal to protect existing, coordinated services from interference by later-in-time licensees/market access recipients demanding two-degree transmission levels. Intelsat stated that, while such a rule – if crafted carefully – would help maintain the status quo existing at the time the later-in-time satellite began operating, it would not alleviate the problem of devaluing the ITU filing of the operator with the higher priority. In response to the concern raised by FCC staff that, absent two-degree rules, a higher priority applicant could act unreasonably in coordination, Intelsat suggested that the Commission could clearly articulate its intent to ensure that U.S. licensees and market access recipients abide by the ITU policy that all parties to a coordination act reasonably and attempt to accommodate the operations of other operators.

Please contact the undersigned with any questions.

Sincerely,

*/s/ Jennifer D. Hindin*

Jennifer D. Hindin  
*Counsel for Intelsat*

cc: Phil Verveer  
Diane Cornell  
Jose Albuquerque